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CONFIDENTIAL

**PACIFIC X TELESIS**  
Group-Washington

EX PARTE OR LATE FILED

December 2, 1996

**EX PARTE**

William F. Caton  
Acting Secretary  
Federal Communications Commission  
Mail Stop 1170  
1919 M Street, N.W., Room 222  
Washington, D.C. 20554

RECEIVED

DEC 2 - 1996

Federal Communications Commission  
Office of Secretary

Dear Mr. Caton:

Re: CC Docket No. 96-152, Implementation of the Telecommunications Act of 1996:  
Telemessaging, Electronic Publishing, and Alarm Monitoring Service

At the request of the staff we are submitting the attached material. Please associate this material with the above referenced proceeding.

We are submitting two copies of this notice in accordance with Section 1.1206(a)(1) of the Commission's Rules.

Please stamp and return the provided copy to confirm your receipt. Please contact me should you have any questions or require additional information concerning this matter.

Sincerely,

*Gina Harrison*

cc: Michelle Carey

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December 2, 1996

Michelle Carey, Esq.  
Policy and Program Planning Division  
Common Carrier Bureau  
Federal Communications Commission  
1919 M Street, N.W.  
Room 544  
Washington, D. C. 20554

Dear Ms. Carey:

RE: Implementation of the Telecommunications Act of 1996:  
Telemessaging, Electronic Publishing, and Alarm Monitoring  
Service, CC Docket No. 96-152

The following is the information you requested regarding the manner in which Pacific Bell Interactive Media ("PBIM") disseminates its Pacific Bell At Hand ("At Hand") electronic information guide. Specifically, you asked that PBIM explain how it connects to the global Internet without using Pacific Bell basic telephone services; and, therefore, PBIM is not subject to the structural safeguards of Section 274 of the Telecommunications Act of 1996 (the "Act"). Because internet technology is constantly developing, the At Hand service is still very new, and the regulatory environment has undergone a transition, PBIM's internet architecture has had some changes since its introduction. The following description is based on PBIM's internet architecture as of December 10, 1996.

#### **Background On the At Hand Service**

PBIM's At Hand service is an electronic publishing service (as defined by Section 274(h) of the Act). PBIM launched its At Hand service to consumers on August 30, 1996. The service can be reached by anyone with Internet access on the World Wide Web at: [www.athand.com](http://www.athand.com).

The At Hand service allows consumers to access, via the Internet, an information guide to products and services throughout California. At Hand is organized into themes of interest. Currently those themes are Entertainment & Leisure, House & Home, and Sports & Outdoors.

At Hand differs from a standard yellow page directory. At Hand's approach is not to be an index but rather a solutions provider. For example, if you were

getting ready to host your first barbecue at your new home, At Hand could help you think of everything you would need, find out about special discounts and local sales, and locate the retail sources that have just what you want. At Hand can even print maps to the stores. At the same time, you might spot an entertaining article on barbecuing tips or great seasonal recipes.

The information in At Hand is obtained from the businesses listed in the guide and third party content providers. Examples of third parties who provide content for the At Hand service are: American Express Publishing, BAM Media, BPI Communications, California State Parks Foundation, Competitor, Inc., Foghorn Press, Harper Collins Publishers, Hearst Home Arts, Los Angeles Times Syndicate, New York Times Company Magazines Group, Playbill, Time Inc., Tribune Media, World Publications, Inc., and Zagat Surveys.

### **How the At Hand Service is Disseminated to the Public**

Once PBIM gathers the information for its At Hand service, PBIM must organize the information and put it in an electronic format. That process occurs in PBIM's corporate office located in Pasadena, California. The information then must be sent to PBIM's web site equipment, which is located in Mountain View, California<sup>1</sup> where it is stored for access by persons using the Internet.

Because the organizing and formatting process takes place in a different location from where the information is ultimately stored, there are two types of telecommunication services used by PBIM to make its At Hand service available to the public via the Internet. The first are those used to transport PBIM's information in Pasadena to its web site equipment in Mountain View. The second are those used to connect PBIM's web site equipment in Mountain View to the Internet. (See attached diagram)

As of December 10, 1996, the telecommunications services used by PBIM to transmit its data from its corporate office to its web site equipment will be provided by MFS at contract terms and conditions.<sup>2</sup> PBIM needs to transmit data in this fashion since it is constantly updating and verifying its information from its Pasadena office.

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<sup>1</sup> PBIM contracted with Internet Systems, Inc. to provide physical space for PBIM's web site equipment, monitor the web site equipment to ensure proper operation, and connect to the Internet. Internet Systems, Inc., as well as numerous other companies, provides similar services to others.

<sup>2</sup> MFS' Los Angeles switch equipment is collocated, in compliance with State and Federal requirements, in a Pacific Bell wire center.

To connect PBIM's web site equipment to the Internet, Internet Systems, Inc. has contracted for a direct connection to MAE West, one of several Internet traffic aggregation points in the United States. Again, this direct connection is provided by MFS. At the MAE West facility, Internet Service Providers ("ISPs") connect to one another and exchange Internet traffic.

On the consumer side, how the consumer accesses the Internet generally and the At Hand service specifically is decided by the consumer. The consumer must select an ISP and a means to connect to the ISP from the consumer's personal computer. The means to connect to the ISP can be by a local or interLATA service provider, a wireless or cellular provider or even the ISP itself. The means to connect to the Internet from the ISP is determined by the consumer or the ISP. PBIM does not provide or select any telecommunications service used by a consumer or an ISP to access the Internet and the At Hand service.

A handwritten signature in black ink that reads "Bruce Ramsey". The signature is fluid and cursive, with the first name "Bruce" and last name "Ramsey" clearly distinguishable.

Bruce Ramsey, Esq.  
Counsel for  
Pacific Bell Interactive Media

# PBIM is not a 274 Subsidiary if At Hand is not Disseminated over the Pacific Bell Network

